

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

ZAVEN SARKISIAN (aka "George"),
EDGAR BARSEGHIAN (aka "Arman" or
"Al"), HMAYAK SAMSONYAN (aka
"Hamlet"), DARRYL JOHNSON, and
KONNA HANKS (aka "Connie"),
Defendants.

Case No. 4:14-CR-0440

Stipulation for Protective Order

IT IS HEREBY STIPULATED between the parties, by and through their undersigned attorneys, that this Court issue an Order protecting from disclosure to the public any discovery documents, whether originals or copies, containing personal identifiers (the "Protected Documents").

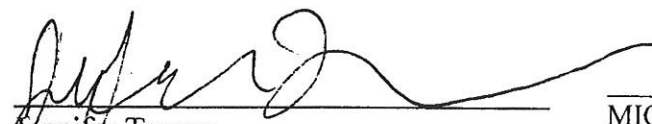
The discovery requested by defendants under Fed. R. Crim. P. 16(a) contains personal identifiers such as social security numbers, driver's license numbers, dates of birth, addresses, e-mail addresses, account numbers, and access devices, of victims and/or other persons in this case (for convenience, the "personal identifiers"). Many of these documents may include personal identifiers that defendants may choose to use as evidence in this case. To ensure that victims are not further victimized, the United States may redact personal identifiers on certain Protected Documents. That said, out of an abundance of caution, the parties stipulate to the following Protective Order:

1. **Under no circumstances shall defendants retain any Protected Documents.** If defendants create notes that contain any personal identifiers obtained from the Protected Documents, then defendants' attorneys shall retain such notes for defendants.

2. Defendants, defendants' attorneys of record, and people (i) employed by those attorneys of record and (ii) performing defense services on behalf of defendants (such as attorneys not of record, paralegals, secretaries, investigators, and experts) may access the Protected Documents only under the following restrictions:
 - a. The people listed above shall not allow any other person to read or copy the Protected Documents.
 - b. The people listed above shall not allow the Protected Documents to be disseminated to any other person not listed above.
 - c. The people listed above shall not allow the Protected Documents to be used for any purpose other than to defend against the charges in the Indictment or any Superseding Indictment in this case.
3. Defendants' attorneys shall inform any person to whom disclosure may be made of the terms of this Order.
4. This Order shall not restrict the use as evidence of the Protected Documents during the trial of this matter.
5. No more than 30 days after defendants has exhausted all appellate rights or rights under 18 U.S.C. § 2255, whichever is later, defendants' attorney(s) shall either (a) return the Protected Documents to counsel for the United States, or (b) destroy the Protected Documents and provide a certification of such to counsel for the United States.

Respectfully submitted,

KENNETH MAGIDSON
United States Attorney

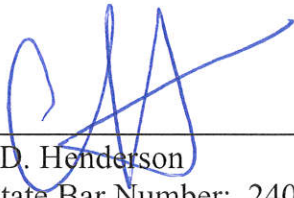


Jennifer Turner
Texas State Bar Number: 24071130

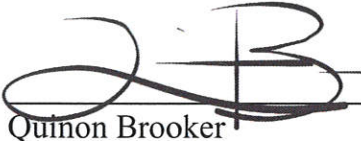
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ORDER

The Parties' stipulation is granted, and the above-described Protective Order shall issue.

IT IS SO ORDERED this ____ day of November 2014.

THE HONORABLE KEITH P. ELLISON
UNITED STATES DISTRICT JUDGE